

# EXHIBIT 13

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:22-cv-22706-RNS

BELL NORTHERN RESEARCH, LLC,

Plaintiff

v.

HMD AMERICA, INC.; HMD GLOBAL OY;  
SHENZHEN CHINO-E COMMUNICATION  
CO., LTD.; HON HAI PRECISION  
INDUSTRY CO., LTD; TINNO MOBILE  
TECHNOLOGY CORP.; SHENZHEN  
TINNO MOBILE CO., LTD.; TINNO USA,  
INC.; UNISOC TECHNOLOGIES CO., LTD.;  
SPREADTRUM COMMUNICATIONS USA,  
INC.; WINGTECH TECHNOLOGY CO.;  
LTD.; WINGTECH INTERNATIONAL,  
INC.; BEST BUY CO., INC.; BEST BUY  
STORES L.P.; TARGET CORP.; WALMART  
INC.,

**JURY TRIAL DEMANDED**

Defendants.

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**DECLARATION OF PAUL RICHTER IN SUPPORT OF BELL NORTHERN  
RESEARCH LLC'S OPPOSITION TO DEFENDANT HON HAI PRECISION  
INDUSTRY CO., LTD'S MOTION FOR EXCEPTIONAL CASE STATUS**

I, Paul Richter, declare as follows:

1. I am an attorney licensed to practice law and a member in good standing of the New York State Bar. I am a partner with the Devlin Law Firm LLC, and counsel of record for Plaintiff Bell Northern Research LLC ("Plaintiff") in the above-entitled action. I have personal knowledge of the matters set forth herein and if called, I could competently testify thereto.

2. I make this declaration in support of Plaintiff's Opposition to Defendant Hon Hai Precision Industry Co., Ltd's Motion for Exceptional Case Status, and I have read that Hon Hai motion and the declarations associated therewith.

3. The first Complaint against Hon Hai was filed on April 6, 2022 as *Bell Northern Research, LLC*, No. 1:22-cv-21035-RNS, Dkt. 1 (S.D. Fla. April 6, 2022.) About a month after that -21035 case was filed, I was contacted by counsel for Hon Hai (Mr. Theodore Angelis) and we communicated three times over the phone and several times via email from May 11 until August 24, 2022, as reflected in the email string attached as Ex. 6 to BNR's opposition brief.

4. Part of the foregoing communications were to arrange a 90-day extension on May 20 for Hon Hai to respond to the first Complaint in exchange for waiving service, taking its response date to the end of August, 2022. (Ex. 6 at 4-5.)

5. During each of the foregoing telephone and email communications, counsel for Hon Hai never raised an issue of alleged lack of personal jurisdiction over Hon Hai in this Court. Rather, counsel for Hon Hai indicated that Hon Hai did not manufacture the accused devices for HMD (another defendant) and should be dismissed for that reason. (Ex. 6 at 1, 6.) However, counsel for Hon Hai never offered any evidence of Hon Hai's supposed non-involvement in making the accused products, such as a declaration from Hon Hai.

6. Just prior to the extended due date for Hon Hai to respond to the first Complaint, on August 25, 2022, the -21035 case was dismissed without prejudice by BNR as against all of the named defendants in that case (including Hon Hai). *Bell Northern Research, LLC*, No. 1:22-cv-21035-RNS, Dkt. 55 (S.D. Fla. Aug. 25, 2022.)

7. BNR's reasons for dismissing the first Complaint had nothing to do with Hon Hai's counsel's foregoing statements.

8. Since the filing of the first Complaint on April 6, 2022, BNR has stood by and continues to stand by its infringement allegations as against Hon Hai in the first Complaint in the

-21305 action, dismissed without prejudice, and in this case (also dismissed without prejudice) that included those same allegations against the same products and some additional products.

I declare under penalty of perjury under the laws of the United States the foregoing is true and correct.

Executed this 5th day of May, 2023,

/s/ Paul Richter  
Paul Richter